

**Attachment to Annual 47 C.F.R. § 64.2009(e) CPNI Compliance Certification**

**EB Docket No. 06-36**

**Statement Regarding CPNI Operating Procedures**

The CPNI Operating Procedures of WaveDivision Holdings, LLC (“Wave”) on behalf Wave subsidiaries and telecommunications carriers WaveDivision I, LLC, WaveDivision II, LLC, WaveDivision III, LLC, Cedar Communications, LLC, WaveDivision IV, LLC, Wave/Powers Acquisition, LLC, Astound Broadband, LLC, Wave Business Solutions, LLC, and WaveDivision VII, LLC (collectively, the “Wave Subsidiaries”), ensure that Wave and the Wave Subsidiaries are and will be in compliance with 47 U.S.C. 222 and the rules contained in Title 47, Chapter 1, Subchapter B. Part 64, Subpart U of the Code of Federal Regulations, 47 C.F.R. § 64.2001 *et seq.* of the commission’s rules. All of Wave’s CPNI Operating Procedures are the Operating Procedures of any and all Wave Subsidiaries. Included among the provisions of Wave’s CPNI Operating Procedures are:

- A requirement that Wave have at all times a CPNI Compliance Officer to supervise the implementation of Wave’s CPNI Operating Procedures.
- Detailed procedures for safeguarding CPNI, including procedures for customer authentication and password protection of CPNI, in compliance with § 64.2010.
- Detailed procedures for determining what type of customer approval is necessary for use, disclosure and access to CPNI, in compliance with § 64.2007. In those instances in which customer approval is required for use of CPNI, Wave obtains approval through verbal, written, or electronic methods in compliance with § 64.2007.
- Detailed procedures for obtaining opt-out and opt-in approval from customers. For one-time use of CPNI on inbound and outbound customer telephone contacts for the duration of the call, Wave representatives obtain verbal consent from the customer pursuant to the Commission’s rules.
- A requirement that the billing system records for customers’ accounts allow the status of customers’ CPNI approval to be easily ascertained prior to the use of CPNI, in compliance with § 64.2009.
- A requirement for supervisory approval for all outbound marketing campaigns, including determination of any customer approval requirements for the campaigns, in compliance with § 64.2009.
- A requirement that personnel be trained to identify what customer information is CPNI, as defined in § 64.2003, and that personnel be trained as to when they are and are not authorized to use CPNI, in compliance with § 64.2009.
- A written disciplinary process for misuse of CPNI, in compliance with § 64.2009.
- Detailed filing, notice and recordkeeping requirements.
- Detailed procedures to be followed in the event of a breach of CPNI, in compliance with § 64.2011.

Wave and the Wave Subsidiaries were not required to take action against any data brokers in 2017, nor did Wave or any of the Wave Subsidiaries receive any customer complaints based on unauthorized release of CPNI in 2017.